



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Lynn Dotter, Treasurer
Republican Central Committee of
San Luis Obispo County
1179 Toro Street
Box 1075
San Luis Obispo, CA 93401

OCT 16 1996

Identification Number: C00263053

Reference: April Quarterly Report (1/1/96-4/15/96)

Dear Ms. Dotter:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-On Schedule H1 of your report, you have counted too many points in the Ballot Composition box for state and local party committees and your calculations to determine the federal allocation ratio are incorrect. Please refer to the instructions on the back of the Schedule H1 noting that a committee may not take more than the number of points printed on each line. Please amend your report to include a corrected Schedule H1 and note that a change in this ratio may make it necessary to repay your non-federal account for any overpayments they may have made. While the Commission may take further legal action concerning any impermissible overpayments by the non-federal account, your prompt action will be taken into consideration.

-Your committee reports disbursements on Schedule B and Schedule H4 which appear to be identical. Please note that any activity which is financed entirely by the federal account should be reported on Schedule B supporting Line 21(b), not Schedule H4 supporting Line 21(a)(i). Likewise, any allocable expenses which are paid jointly should only be disclosed on Schedule H4 supporting Line 21(a)(i), not Schedule B supporting Line 21(b). Duplication in reporting disbursements may cause inflated disbursement totals. Please amend your report to clarify your disbursements. 11 CFR §106.5

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to check the appropriate

CATEGORY box for the payment(s) made to USPO. Please amend your report to disclose the appropriate category.

-Schedule H4 discloses disbursements for Administrative/Voter Drive which appear to be using a ratio inconsistent with those disclosed on Schedule H1. Please amend your report to clarify this apparent discrepancy.

-Your report discloses limited payments for administrative expenses. Each committee utilizing separate federal and non-federal accounts is required to allocate any administrative expenses between the accounts in proportion to the BALLOT COMPOSITION METHOD derived from FEC Schedule H1. A Schedule H1 must be filed with the first FEC FORM 3X submitted each year. 11 CFR §106.5(d)

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. §434(b)(3)(D)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Line 23 of the Detailed Summary Page of your report discloses a total of \$0 in contributions to federal candidates. The sum of the entries itemized on Schedule B, however, indicates the total to be \$1,500. Please amend your report to clarify the discrepancy.

-Your calculations for Line 30, Column A appear to be incorrect. FEC calculations disclose this amount(s) to be \$5,244. Please provide the corrected total(s) on the Detailed Summary Page.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive are incorrect. EVENT YEAR- TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category, not by individual purpose such as "Utilities" or "Rent". Please amend your report by providing the correct Administrative/Voter Drive EVENT YEAR-TO-DATE totals.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Andrew J. Dodson
Senior Reports Analyst
Reports Analysis Division

